BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

FILED
11-09-07
04:59 PM

Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning.	Rulemaking 04-04-003 (Filed April 1, 2004)
Order Instituting Rulemaking to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-run and Long-run Avoided Costs, Including Pricing for Qualifying Facilities.	Rulemaking 04-04-025 (Filed April 22, 2004)

THE CALIFORNIA COGENERATION COUNCIL'S RESPONSE TO PACIFIC GAS AND ELECTRIC COMPANY'S, SOUTHERN CALIFORNIA EDISON COMPANY'S, SAN DIEGO GAS & ELECTRIC COMPANY'S, THE UTILITY REFORM NETWORK'S, AND THE DIVISION OF RATE PAYER ADVOCATES' APPLICATION FOR REHEARING OF THE OPINION ON FUTURE POLICY AND PRICING FOR QUALIFYING FACILITIES, DECISION 07-09-040

Jerry R. Bloom
Joseph M Karp
Karleen M. O'Connor
WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111
Tel.: (415) 591-1000
Fax: (415) 591-1400
Email: jbloom@winston.com
jkarp@winston.com
koconnor@winston.com
Attorneys for the
California Cogeneration Council

November 9, 2007

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Promote Policy and Program Coordination and Integration in Electric Utility Resource Planning.	Rulemaking 04-04-003 (Filed April 1, 2004)
Order Instituting Rulemaking to Promote Consistency in Methodology and Input Assumptions in Commission Applications of Short-run and Long-run Avoided Costs, Including Pricing for Qualifying Facilities.	Rulemaking 04-04-025 (Filed April 22, 2004)

THE CALIFORNIA COGENERATION COUNCIL'S RESPONSE TO PACIFIC GAS AND ELECTRIC COMPANY'S, SOUTHERN CALIFORNIA EDISON COMPANY'S, SAN DIEGO GAS & ELECTRIC COMPANY'S, THE UTILITY REFORM NETWORK'S, AND THE DIVISION OF RATE PAYER ADVOCATES' APPLICATION FOR REHEARING OF THE OPINION ON FUTURE POLICY AND PRICING FOR QUALIFYING FACILITIES, DECISION 07-09-040

I. INTRODUCTION

Pursuant to Rule 16.1(d) of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission"), the California Cogeneration Council ("CCC") respectfully submits this Response to Pacific Gas and Electric Company's ("PG&E"), Southern California Edison Company's ("SCE"), San Diego Gas and Electric Company's ("SDG&E") (collectively, the "IOUs"), The Utility Reform Network's ("TURN") and the Division of Rate Payer Advocates' ("DRA") Application for Rehearing of the Opinion on Future Policy and Pricing for Qualifying Facilities, Decision 07-09-040 ("Application for Rehearing").

The IOUs, TURN and DRA have failed to meet their burden of showing that

Decision 07-09-040 ("Decision") is erroneous or is unsupported by "the record or law."[1] First, the Commission's adoption of the time of use ("TOU") factors employed in the Market Price Referent ("MPR") is supported not only by the record but also by prior Commission decisions. Second, the Commission employs a hybrid approach in the Decision when calculating the incremental energy rate ("IER") in the Market Index Formal ("MIF"), which is supported by the record and is permissible under Commission precedent. Third, the IOU's purchase obligation for small qualifying facilities ("QF") does not run afoul of Public Utility Regulatory Policies Act ("PURPA") because the Decision includes a cap on the aggregate contract capacity from such QFs that the IOUs are required to purchase. Finally, the Decision's refusal to apply retroactively the adopted formula for short run avoided cost ("SRAC") pricing is also supported by evidence in the record, is separately stated in the conclusions of law, and thus, there is no legal error. Accordingly, the IOUs', TURN's and DRA's Application for Rehearing should be denied.

II. DISCUSSION

A. The Decision's Use of the MPR TOU Factors is Supported by the Record and Applicable Law

i. The Record Supports the Commission's Use of MPR TOU Factors

Contrary to the arguments of IOUs, TURN and DRA, the Commission's use of TOU factors employed in the MPR is supported by evidence in the record. The CCC presented evidence regarding the need to update the TOU factors for PG&E and SDG&E, as both utilities employed outdated TOU factors for QF pricing that were "flat" across TOU periods.[2] The CCC's evidence showed that, in contrast to these flat and dated TOU factors, PG&E and SDG&E used more recent TOU factors in

[1] Public Utilities Code section 1732, Rule 16.1.

[2] CCC/Beach Ex. 102 at 54.

their RPS solicitations that better accounted for the high value of power in peak periods.[3] The CCC presented evidence in support of the use of the TOU factors that PG&E and SDG&E included in their 2005 RPS solicitations and that subsequently were adopted in the MPR calculations.[4] These MPR TOU factors are the most current and up-to-date TOU factors in use, and the record supports the Commission's use of these TOU factors for SRAC pricing. Thus, sufficient evidence exists in the record to support the Commission's decision to use the MPR TOU factors.

ii. The Commission Can Take Notice of Its Own Decisions

As further support for the use of the MPR TOU factors in this instance, the Commission also relied on its decisions in prior proceedings. The Decision states that the Commission intends to "update[] the IOU's TOU/TOD factors and periods to be consistent with the TOU factors adopted in other procurement proceedings."[5] In one such example, Decision 06-05-039, the Commission approved the RPS procurement plans for PG&E, SCE and SDG&E. Each of these RPS procurement plans contained TOU factors specific to each of the utilities.[6] Reliance on prior proceedings such as this does not constitute legal error because the Commission can take notice of and rely on its own past decisions in making future decisions.[7]

In this case, the Commission adopted the TOU factors employed in the MPR because they "ensure that the time differentiated value of energy is appropriately taken into account when comparing projects against the MPR. TOU factors used for the purposes of this proceeding fulfill fundamentally the same role . . . . It is reasonable to adopt [them] here." The Commission can take notice of the TOU

---

[3] *Id.*

[4] *Id.* at 55.

[5] Decision 07-09-040 at 72.

[6] Decision 06-05-039 at 67-68.

[7] *See* Decision 00-11-016 at 1 ("It is self-evident that the Commission may rely upon its past decisions in making future decisions, therefore taking official notice of its own decisions is unnecessary.")

factors it approved in other proceedings to support its decision to adopt TOU factors in this case that are consistent with the TOU factors used to determine the MPR. Thus, contrary to the IOU's, TURN's and DRA's arguments, the Commission's adoption of the MPR TOU factors is supported by record evidence.

iii. The Decision Requires that the TOU Factors be Consistent With, Not Necessarily Equal To, MPR TOU Factors.

The Application for Rehearing alleges that the Decision errs because it requires use of "all-in" energy and capacity MPR TOU factors for SRAC energy prices. The Decision, however, states that the TOU factors used for SRAC pricing must be "*consistent* with the adopted TOU factors for the Market Price Referent ("MPR")."[8] The Decision does not necessarily require that the TOU factors be equal to the TOU factors for the MPR, as the IOUs, TURN and DRA argue. To the contrary, the Decision leaves the implementation of the TOU factors, and thus the resolution of the energy-only versus all-in question raised by the Application for Rehearing, to the implementation phase of the proceedings, which will begin with workshops to be held next week.[9] During the implementation phase of the proceedings, the Commission may in fact decide that the TOU factors should equal the MPR TOU factors.[10] As a matter of law, however, the Commission did not err when stating that the TOU factors should be consistent with the MPR TOU factors.

Furthermore, in the Findings of Fact, the Commission specifically finds that the Commission should further refine and update the TOU factors used to calculate SRAC prices in a separate proceeding.[11] The IOUs, TURN and DRA therefore err when they allege that the Decision's adoption

---

[8] Decision 07-09-040 at 72 (emphasis added).

[9] Notably, SDG&E's TOU factors are energy-only factors only.

[10] The CCC reserves the right to support such a position during the implementation proceedings.

[11] Decision 07-09-040 at 142, Finding # 29.

of all-in factors constitutes legal error, because the Decision did not adopt all-in factors. Rather, the Decision states only that that the TOU factors used for SRAC pricing must be consistent with the RPS TOU factors, and such a conclusion is not legal error.[12]

B. The Decision's Calculation of the MIF is Consistent with PURPA and Does Not Constitute Legal Error

i. The Commission Has Authority To Adopt A Hybrid Approach

In the Decision, the Commission adopted an "interim hybrid approach" aimed at achieving "SRAC prices that more closely reflect utility avoided costs."[13] This hybrid approach combines a market-derived value with an administratively-determined approach adopted in other Commission decisions. The Commission's hybrid approach is supported fully by the record and permissible under law, and no legal error exists.

The Commission has the latitude to evaluate and weigh record evidence presented to it and then make a decision that is a compromise of the evidence presented. Such a compromise position does not constitute legal error. Indeed, the Commission has held that:

> All of the evidence adduced by the parties on this key point directly bears on, and contributes to the rationale for, our decision herein. As noted above, this evidence is conflicting. It is entirely within our discretion to weigh and rule on this conflicting factual evidence in a manner that results in a reasonable compromise rather than an all-or-nothing outcome.[14]

Thus, the fact that the Commission evaluated and weighed the record evidence before it and reached a compromise does not mean that the Commission committed legal error. The Commission acted within its discretion to render a Decision that is a hybrid of the record evidence before it.

---

[12] *Id.* at 72.

[13] Decision 07-09-040 at 62.

[14] Decision 02-12-064 at 61.

Additionally, the IOUs, TURN and DRA argue that the Commission's hybrid position is "not based on anything in the record of this proceeding."[15] This is not correct. The IOUs, TURN, and DRA advocated the use of the NP-15 and SP-15 prices alone to derive a market heat rate.[16] The Commission held, however, that using NP-15 and SP-15 prices alone would result in understated utility avoided costs.[17] The Cogeneration Association of California ("CAC")/Energy Producers and Users Coalition ("EPUC") and the Independent Energy Producers ("IEP") both presented substantial evidence that the administrative heat rates adopted in D.96-12-028 continue today to represent utility avoided costs accurately.[18] The Commission recognized, however, that this approach alone "may no longer serve as the most reasonable proxy for determining avoided costs."[19] The CCC started with NP-15 and SP-15 forward prices, and used different adjustments, adders, and averages than the IOUs, to derive heat rates close to the administrative heat rates adopted in D. 96-12-028 and used in the Decision.[20] The Commission weighed this conflicting evidence related to heat rates and derived a hybrid position that relied on market derived prices while correcting for the failure of existing markets to reflect the full cost of generation in California.[21] The result is "a reasonable compromise rather than an all-or-nothing outcome."[22] Thus, both components of the hybrid formula are supported by record evidence, and there is no legal error.

---

[15] Application for Rehearing, p. 8.

[16] Decision 07-09-040 at 29-37.

[17] Decision 07-09-040 at 61.

[18] *See, e.g.* IEP/Manson Exh. 95 at 54-61.

[19] Decision 07-09-040 at 59

[20] CCC/Beach Exh. 102 at 47, Table 8

[21] *Id.* at 64.

[22] Decision 02-12-064 at 61.

ii. The Commission's Adoption of the Use of Historic Heat Rates Is Supported by Record Evidence

Additionally, the Commission's adoption of the use of historical, administrative heat rates for the utilities is supported by record evidence. CCC, IEP, and CAC/EPUC all showed that current avoided costs are accurately represented by heat rates in the same range as the heat rates used historically in the Transition Formulas approved in Decision 96-12-028. The Decision adopted the use of administrative heat rates for PG&E and SDG&E that are derived through a simple algebraic re-arrangement of the PG&E and SDG&E transition formulas into the form of the MIF: SRAC Energy = Gas Price x Heat Rate + Adder.[23] The administrative heat rate for SCE is simply the average SRAC heat rate employed in SCE's SRAC pricing formula over the 11 years that the Transition Formula has been in effect (October 1996 through September 2007).[24]

C. The "Small QF Option" is Consistent with PURPA and Does Not Require Utilities to Purchase Unneeded Capacity

Finally, the IOUs, TURN and DRA mischaracterize the "Small QF Option" as a mandatory purchase obligation imposed upon the utilities regardless of capacity need. Rather, the "Small QF Option" gives a small QF (20 MW or less) multiple contracting options while capping the total amount of QF power under the small QF option to 110% of each IOU's current QF capacity. Thus, IOUs obligation is limited to not rejecting small QFs' requests for a contract on the basis of oversubscription unless the contract "would cause the IOU to have more than a 10% growth in its overall QF portfolio . .

---

[23] Decision 07-09-040, at 66 and Table 2, lines 13 and 15; also Ex. 104, Table ES-1. *See also* the CCC's opening comments on the Alternate Decision of Commissioner Grueneich, at page 8, footnote 21, which provides an exemplary calculation.

[24] Ex. 102, Table 1; also see the calculation provided in the CCC's opening comments on the Alternate Decision of Commissioner Grueneich, at page 9, footnote 27. This calculation is based on the record of SCE's monthly avoided cost postings filed with the Commission, as summarized in Table 1 of Ex. 102.

. ."[25] Additionally, the Decision requires that the cap on this requirement be re-evaluated during the long-term procurement proceeding.[26]

This approach is consistent with PURPA, which requires the utility to purchase "any energy and capacity" that is "made available" to the utility by a QF, at rates equal to the utilities avoided cost.[27] Nothing in the Decision requires that the IOUs oversubscribe in violation of PURPA. Indeed, the Decision places a cap on the amount of power purchased under this option that is far below the IOUs' current need for power as identified in their long-term procurement plans (LTPPs), and – importantly – allows this cap to be reviewed each year as part of the IOUs' LTPPs, so that the possible amount of power purchased from small QFs remains consistent with the IOUs' needs. This provision of the Decision requires that the IOUs enter into contracts with small QFs that would otherwise be marginalized by the IOU solicitation process. Such a requirement does not run afoul of PURPA; in fact, it upholds the essence of why Congress adopted PURPA – to provide a market for generation that, absent the law, the IOUs would not purchase.

D. The Prospective Implementation of the SRAC Methodology Does Not Constitute Legal Error

The IOUs, TURN and DRA are incorrect in their assertion that the Decision constitutes legal error because it fails to implement SRAC pricing retroactively. Retroactive application of SRAC energy prices is not appropriate in this instance, because the Commission considered the issue and concluded that the SRAC transition formula did not exceed utility avoided costs or systemically violate PURPA.[28] To the contrary, the Commission concluded that the SRAC energy prices resulting from the

---

[25] Decision 07-09-040 at 121.

[26] *Id.* at 121.

[27] 16 U.S.C. § 824a-3(b); 18 C.F.R. § 292.30(a)(2003); *see also American Paper Institute v. American Electric Power*, 461 U.S. 402 (1983).

[28] Decision 07-09-040 at 145, Conclusion of Law #5, 7, and 8.

Transition Formula accurately represented the utilities' avoided costs,[29] that changes to the MIF should apply to the "going forward" SRAC energy prices under existing and new contracts,[30] and that a decision to revise the Transition Formula does not demonstrate that prices under the Transition Formula violate PURPA.[31] Indeed, the IOUs, TURN and DRA fail to cite to any evidence that would support a conclusion that the SRAC transition formula exceeded utility avoided costs or systemically violated PURPA.

In fact, the CCC submitted evidence that the SRAC prices paid under RSO1 contracts appropriately represented avoided costs.[32] Additionally, as the Commission has previously recognized, the SRAC payment formula need not match utility avoided cost in every hour of every day; to the contrary, the avoided cost formula is designed to track utility avoided costs over time.[33] Thus, the IOUs, TURN and DRA have not shown that the Decision's refusal to apply the SRAC formula retroactively constitutes legal error, and the Commission's decision on the issue is fully supported by the record.

III. CONCLUSION

For the reasons set forth above, the Commission should deny PG&E's, SCE's, SDG&E's, TURN's and DRA's Application for Rehearing for the reasons set forth herein.

---

[29] Decision 07-09-040 at 145, Conclusion of Law # 5.

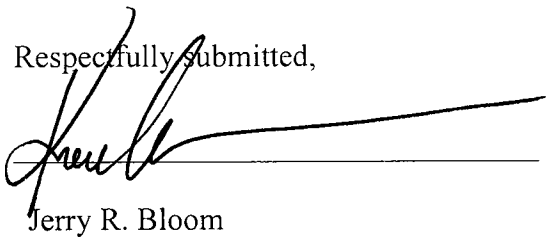
[30] *Id.*; Conclusion of Law #7.

[31] *Id.*; Conclusion of Law # 8.

[32] CCC/Beach, Ex. 103, at 54-55; *see also* CCC/Beach, Ex. 102 at 27-31.

[33] Decision 04-07-037

Respectfully submitted,



Jerry R. Bloom
Joseph M. Karp
Karleen M. O'Connor
WINSTON & STRAWN LLP
101 California Street
San Francisco, CA 94111
Tel.: (415) 591-1000
Fax: (415) 591-1400
Email: jbloom@winston.com
jkarp@winston.com
koconnor@winston.com
Attorneys for the
California Cogeneration Council

Certificate of Service

I hereby certify that I have this day served a copy of the

California Cogeneration Council's Response to Pacific Gas and Electric Company's, Southern California Edison Company's, San Diego Gas & Electric Company's, The Utility Reform Network's and the Division of Rate Payer Advocates' Application for Rehearing of the Opinion on Future Policy and Pricing for Qualifying Facilities, Decision 07-09-040

on all known parties to R.04-04-003 and R.04-04-025 by sending a copy via electronic mail and by mailing a properly addressed copy by first-class mail with postage prepaid to each party named in the official service list without an electronic mail address.

Executed on November 9, 2007 at San Francisco, California.

Rosalie Marschall

Rosalie Marschall

E-Service List for R.04-04-003
Last Changed November 7, 2007

anogee@ucsusa.org
roger@berlinerlawpllc.com
lisa.decker@constellation.com
jimross@r-c-s-inc.com
toms@i-cpg.com
pseby@mckennalong.com
todil@mckennalong.com
maureen@lennonassociates.com
douglass@energyattorney.com
berj.parseghian@sce.com
woodrujb@sce.com
janet.combs@sce.com
michael.backstrom@sce.com
daking@sempra.com
gbaker@sempra.com
cneedham@edisonmission.com
phil@reesechambers.com
mflorio@turn.org
cwl@cpuc.ca.gov
kpp@cpuc.ca.gov
map@cpuc.ca.gov
dwang@nrdc.org
ek@a-klaw.com
evk1@pge.com
magq@pge.com
saw0@pge.com
agrimaldi@mckennalong.com
kbowen@winston.com
jkarp@winston.com
jeffgray@dwt.com
alhj@pge.com
ssmyers@att.net
rick_noger@praxair.com
wbooth@booth-law.com
hoerner@redefiningprogress.org
cchen@ucsusa.org
elarsen@rcmdigesters.com
gmorris@emf.net
nrader@calwea.org
tomb@crossborderenergy.com
pcmcdonnell@earthlink.net
wem@igc.org
michaelboyd@sbcglobal.net
joyw@mid.org
brbarkovich@earthlink.net
bill@jbsenergy.com.
Dick@DavisHydro.com
grosenblum@caiso.com
sford@caiso.com
abb@eslawfirm.com
dkk@eslawfirm.com
atrowbridge@daycartermurphy.com
mpa@a-klaw.com
carlo.zorzoli@enel.it
dgulino@ridgewoodpower.com
bshort@ridgewoodpower.com
sesco@optonline.net
csmoots@perkinscoie.com
jbwilliams@mwe.com
myuffee@mwe.com
rshapiro@chadbourne.com
ralph.dennis@constellation.com
dmcfarlan@mwgen.com
brianhaney@useconsulting.com
dsaul@pacificsolar.net
chilen@sppc.com
rprince@semprautilities.com
hchoy@isd.co.la.ca.us
dhuard@manatt.com
pucservice@manatt.com
curtis.kebler@gs.com
sam@climateregistry.org
mgibbs@icfconsulting.com
Case.Admin@sce.com
j.eric.isken@sce.com
gary.allen@sce.com
laura.genao@sce.com
lizbeth.mcdannel@sce.com
tory.weber@sce.com
jyamagata@semprautilities.com
dwood8@cox.net
tim.hemig@nrgenergy.com
kmelville@sempra.com
gbass@semprasolutions.com
liddell@energyattorney.com
scottanders@sandiego.edu
bpowers@powersengineering.com
centralfiles@semprautilities.com
cmanzuk@semprautilities.com
irene.stillings@energycenter.org
jkloberdanz@semprautilities.com
dpapapostolou@semprautilities.com
jleslie@luce.com
lkostrzewa@edisonmission.com
pherrington@edisonmission.com
bjl@bry.com
pepper@cleanpowermarkets.com
chris@emeter.com
mdjoseph@adamsbroadwell.com
slefton@aptecheng.com
diane_fellman@fpl.com
freedman@turn.org
nao@cpuc.ca.gov
filings@a-klaw.com
nes@a-klaw.com
rsa@a-klaw.com
ell5@pge.com
mekd@pge.com
mrh2@pge.com
taj8@pge.com
cem@newsdata.com
bcragg@goodinmacbride.com
jscancarelli@flk.com
koconnor@winston.com
lcottle@winston.com
ldolqueist@steefel.com
ren@ethree.com
bobgex@dwt.com
stevegreenwald@dwt.com
CRMd@pge.com
cpuccases@pge.com
mdbk@pge.com
ecrem@ix.netcom.com
l_brown369@yahoo.com
mecsoft@pacbell.net
gxl2@pge.com
karp@pge.com
vjw3@pge.com
k.abreu@sbcglobal.net
mark_j_smith@fpl.com
beth@beth411.com
mhharrer@sbcglobal.net
andy.vanhorn@vhcenergy.com
alexm@calpine.com
kowalewskia@calpine.com
duggank@calpine.com
sbeserra@sbcglobal.net
phanschen@mofo.com
editorial@californiaenergycircuit.net
mrw@mrwassoc.com
mrw@mrwassoc.com
mrw@mrwassoc.com
rschmidt@bartlewells.com
janice@strategenconsulting.com
tomk@mid.org
sarveybob@aol.com
gabriellilaw@sbcglobal.net
rmccann@umich.edu
demorse@omsoft.com
brian.theaker@williams.com

E-Service List for R.04-04-003
Last Changed November 7, 2007

davidreynolds@ncpa.com
steveng@destrategies.com
dougdpucmail@yahoo.com
dcarroll@downeybrand.com
etiedemann@kmtg.com
kdw@woodruff-expert-services.com
steven@iepa.com
www@eslawfirm.com
vwood@smud.org
rlauckhart@henwoodenergy.com
jesus.arredondo@nrgenergy.com
karen@klindh.com
pholley@covantaenergy.com
rfp@eesconsulting.com
dws@r-c-s-inc.com
ppl@cpuc.ca.gov
ayk@cpuc.ca.gov
cab@cpuc.ca.gov
chh@cpuc.ca.gov
djh@cpuc.ca.gov
joh@cpuc.ca.gov
jmh@cpuc.ca.gov
msw@cpuc.ca.gov
mjd@cpuc.ca.gov
mts@cpuc.ca.gov
mkh@cpuc.ca.gov
gig@cpuc.ca.gov
rls@cpuc.ca.gov
skh@cpuc.ca.gov
car@cpuc.ca.gov
skg@cpuc.ca.gov
tdp@cpuc.ca.gov
tcx@cpuc.ca.gov
tcr@cpuc.ca.gov
tbo@cpuc.ca.gov
snuller@ethree.com
bmeister@energy.state.ca.us
dks@cpuc.ca.gov
kris.chisholm@eob.ca.gov
mjaske@energy.state.ca.us
wsm@cpuc.ca.gov
ikwasny@water.ca.gov
mmiller@energy.state.ca.us
rwethera@energy.state.ca.us

Via U.S.Mail:

Anan H. Sokker
Chadbourne & Parke LLP
1200 New Hampshire Ave., NW
Washington, DC 20005

Tandy McMannes
Solar Thermal Electric Alliance
101 Ocean Bluff's Blvd.
Apt. 504
Jupiter, FL 33477

Shawn Smallwood, PhD
109 Luz Place
Davis, CA 95616

E-Service List for R.04-04-025
Last Changed November 7, 2007

anogee@ucsusa.org
roger@berlinerlawpllc.com
lisa.decker@constellation.com
jimross@r-c-s-inc.com
toms@i-cpg.com
pseby@mckennalong.com
todil@mckennalong.com
maureen@lennonassociates.com
douglass@energyattorney.com
berj.parseghian@sce.com
woodrujb@sce.com
janet.combs@sce.com
michael.backstrom@sce.com
daking@sempra.com
gbaker@sempra.com
cneedham@edisonmission.com
phil@reesechambers.com
mflorio@turn.org
cwl@cpuc.ca.gov
kpp@cpuc.ca.gov
map@cpuc.ca.gov
dwang@nrdc.org
ek@a-klaw.com
evk1@pge.com
magq@pge.com
saw0@pge.com
agrimaldi@mckennalong.com
kbowen@winston.com
jkarp@winston.com
jeffgray@dwt.com
alhj@pge.com
ssmyers@att.net
rick_noger@praxair.com
wbooth@booth-law.com
hoerner@redefiningprogress.org
cchen@ucsusa.org
elarsen@rcmdigesters.com
gmorris@emf.net
nrader@calwea.org
tomb@crossborderenergy.com
pcmcdonnell@earthlink.net
wem@igc.org
michaelboyd@sbcglobal.net
joyw@mid.org
brbarkovich@earthlink.net
bill@jbsenergy.com.
Dick@DavisHydro.com
grosenblum@caiso.com
sford@caiso.com
abb@eslawfirm.com
dkk@eslawfirm.com
atrowbridge@daycartermurphy.com
mpa@a-klaw.com
carlo.zorzoli@enel.it
dgulino@ridgewoodpower.com
bshort@ridgewoodpower.com
sesco@optonline.net
csmoots@perkinscoie.com
jbwilliams@mwe.com
myuffee@mwe.com
rshapiro@chadbourne.com
ralph.dennis@constellation.com
dmcfarlan@mwgen.com
brianhaney@useconsulting.com
dsaul@pacificsolar.net
chilen@sppc.com
rprince@semprautilities.com
hchoy@isd.co.la.ca.us
dhuard@manatt.com
pucservice@manatt.com
curtis.kebler@gs.com
sam@climateregistry.org
mgibbs@icfconsulting.com
Case.Admin@sce.com
j.eric.isken@sce.com
gary.allen@sce.com
laura.genao@sce.com
lizbeth.mcdannel@sce.com
tory.weber@sce.com
jyamagata@semprautilities.com
dwood8@cox.net
tim.hemig@nrgenergy.com
kmelville@sempra.com
gbass@semprasolutions.com
liddell@energyattorney.com
scottanders@sandiego.edu
bpowers@powersengineering.com
centralfiles@semprautilities.com
cmanzuk@semprautilities.com
irene.stillings@energycenter.org
jkloberdanz@semprautilities.com
dpapapostolou@semprautilities.com
jleslie@luce.com
lkostrzewa@edisonmission.com
pherrington@edisonmission.com
bjl@bry.com
pepper@cleanpowermarkets.com
chris@emeter.com
mdjoseph@adamsbroadwell.com
slefton@aptecheng.com
diane_fellman@fpl.com
freedman@turn.org
nao@cpuc.ca.gov
filings@a-klaw.com
nes@a-klaw.com
rsa@a-klaw.com
ell5@pge.com
mekd@pge.com
mrh2@pge.com
taj8@pge.com
cem@newsdata.com
bcragg@goodinmacbride.com
jscancarelli@flk.com
koconnor@winston.com
lcottle@winston.com
ldolqueist@steefel.com
ren@ethree.com
bobgex@dwt.com
stevegreenwald@dwt.com
CRMd@pge.com
cpuccases@pge.com
mdbk@pge.com
ecrem@ix.netcom.com
l_brown369@yahoo.com
mecsoft@pacbell.net
gxl2@pge.com
karp@pge.com
vjw3@pge.com
k.abreu@sbcglobal.net
mark_j_smith@fpl.com
beth@beth411.com
mhharrer@sbcglobal.net
andy.vanhorn@vhcenergy.com
alexm@calpine.com
kowalewskia@calpine.com
duggank@calpine.com
sbeserra@sbcglobal.net
phanschen@mofo.com
editorial@californiaenergycircuit.net
mrw@mrwassoc.com
mrw@mrwassoc.com
mrw@mrwassoc.com
rschmidt@bartlewells.com
janice@strategenconsulting.com
tomk@mid.org
sarveybob@aol.com
gabriellilaw@sbcglobal.net
rmccann@umich.edu
demorse@omsoft.com
brian.theaker@williams.com

E-Service List for R.04-04-025
Last Changed November 7, 2007

davidreynolds@ncpa.com
steveng@destrategies.com
dougdpucmail@yahoo.com
dcarroll@downeybrand.com
etiedemann@kmtg.com
kdw@woodruff-expert-services.com
steven@iepa.com
www@eslawfirm.com
vwood@smud.org
rlauckhart@henwoodenergy.com
jesus.arredondo@nrgenergy.com
karen@klindh.com
pholley@covantaenergy.com
rfp@eesconsulting.com
dws@r-c-s-inc.com
ppl@cpuc.ca.gov
ayk@cpuc.ca.gov
cab@cpuc.ca.gov
chh@cpuc.ca.gov
djh@cpuc.ca.gov
joh@cpuc.ca.gov
jmh@cpuc.ca.gov
msw@cpuc.ca.gov
mjd@cpuc.ca.gov
mts@cpuc.ca.gov
mkh@cpuc.ca.gov
gig@cpuc.ca.gov
rls@cpuc.ca.gov
skh@cpuc.ca.gov
car@cpuc.ca.gov
skg@cpuc.ca.gov
tdp@cpuc.ca.gov
tcx@cpuc.ca.gov
tcr@cpuc.ca.gov
tbo@cpuc.ca.gov
snuller@ethree.com
bmeister@energy.state.ca.us
dks@cpuc.ca.gov
kris.chisholm@eob.ca.gov
mjaske@energy.state.ca.us
wsm@cpuc.ca.gov
ikwasny@water.ca.gov
mmiller@energy.state.ca.us
rwethera@energy.state.ca.us

Via U.S.Mail:

Anan H. Sokker
Chadbourne & Parke LLP
1200 New Hampshire Ave., NW
Washington, DC 20005

Tandy McMannes
Solar Thermal Electric Alliance
101 Ocean Bluff's Blvd.
Apt. 504
Jupiter, FL 33477

Shawn Smallwood, PhD
109 Luz Place
Davis, CA 95616